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*Proposed Counsel to the Debtors
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
NATIONAL REALTY INVESTMENT ADVISORS, LLC, <i>et al.</i> ¹	Case No.: 22-14539-(JKS)
Debtors.	(Joint Administration Requested)

**DEBTORS' APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS**

On June 7, 2022, the above-captioned debtors and debtors in possession (the “**Debtors**”) each filed a petition for relief under chapter 11 of title 11 of the United States Code, commencing the above-captioned chapter 11 cases (collectively, the “**Chapter 11 Cases**”). Counsel for the Debtors requests that the following relief be provided on a first day basis:

1.	Debtors' Motion For Entry Of An Order (A) Directing Joint Administration Of Chapter 11 Cases And (B) Granting Related Relief
2.	Application for Designation as Complex Chapter 11 Cases

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors' service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

3.	Debtors' Motion For Entry of An Order (I) Granting The Debtors An Extension Of Time To File Their List Of Creditors; (II) Authorizing The Debtors And/Or Their Agent To (A) Prepare A Consolidated List Of Creditors In Lieu Of A Mailing List And (B) Mail Initial Notices; And (III) Granting Related Relief
4.	Debtors' Motion For Entry of An Order (A) Extending Time to File Schedules of Assets And Liabilities, Schedules Of Current Income And Expenditures, Schedules Of Executory Contracts And Unexpired Leases, Statements of Financial Affairs, and (B) Granting Related Relief
5.	Debtors' Motion For Entry Of An Order Authorizing The Debtors To File Under Seal Portions Of The Debtors' Consolidated Creditor Matrix Containing Certain Individual Creditor Information
6.	Debtors' Motion For Entry Of Interim And Final Orders Authorizing, But Not Directing, The Debtors To (A) Pay Certain Prepetition Wages, Salaries, Reimbursable Employee Expenses And Other Employee Compensation Expenses, And Taxes Related Thereto, (B) Honor Certain Employee Benefits, (C) Directing The Debtors' Banks To Honor Checks And Transfers Of Prepetition Employee Obligations, And (D) Granting Related Relief
7.	Debtors' Motion For Entry Of An Order Authorizing The Debtors To (I) Pay Pre-Petition Insurance Premiums (II) Continue Pre-Petition Insurance Programs And (III) Pay All Pre-Petition Obligations In Respect Thereof
8.	Debtors' Motion For Entry Of Interim And Finals Orders Authorizing The Debtors To (I) Continue And Maintain Their Existing Cash Management System And Bank Accounts; And (II) Continue Using Their Existing Business Forms, Checks, And Records

NOTICE

Notice of the Order granting this application will be made under D.N.J. LBR 9013-5(f) on the following parties by email and overnight mail: (i) the Office of the United States Trustee for the District of New Jersey, One Newark Center, Suite 2100, Newark, NJ 07102; (ii) the Debtors' thirty largest unsecured creditors and twenty largest investors, each on a consolidated basis; (iii) S3 RE Bergenline Funding, LLC, S3 RE 1300 Manhattan Funding LLC, and LendingOne LLC; (iv) the U.S. Attorney General; (v) the Internal Revenue Service; (vi) the Securities and Exchange Commission; (vii) the New Jersey Attorney General; (viii) the U.S. Attorney for the District of New Jersey; (ix) the New Jersey Division of Taxation; (x) the New Jersey Bureau of Securities; (xi) the New York Attorney General; (xii) the New York

Department of Taxation and Finance; (xiii) the Florida Attorney General; (xiv) the Florida Department of Revenue; (xv) the Illinois Attorney General; (xvi) the Illinois Department of Revenue; (xvii) the Illinois Securities Department; (xviii) the Alabama Attorney General; (xix) the Alabama Department of Revenue; (xx) the Alabama Securities Commission; (xxi) the Debtors' banking institutions; (xxii) the Debtors' insurance providers; and (xxiii) those parties who have filed a notice of appearance and request for service of pleadings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002.

WHEREFORE, the Debtors respectfully request entry of an order granting the relief requested herein and granting such other relief as is just and proper.

Dated: June 8, 2022

SILLS CUMMIS & GROSS P.C.

/s/ S. Jason Teele

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

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In re:

NATIONAL REALTY INVESTMENT ADVISORS,
LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 22-14539 (JKS)

(Joint Administration Requested)

ORDER REGARDING EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

The relief set forth on the following pages, numbered two (2) and three (3), is hereby
ORDERED.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors' service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

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Debtor: National Realty Investment Advisors, LLC, *et al.*
Case No.: 22-14539
Caption: Order Regarding Debtors' Application For Expedited Consideration of First Day Matters

IT IS ORDERED the following applications and motions (collectively, the “**Motions**”), to be filed by the above-captioned debtors and debtors in possession (the “**Debtors**”), are scheduled for hearing on **June 9, 2022 at 3:30 p.m. (ET)** before the Honorable Judge John K. Sherwood in Courtroom 3D located at Martin Luther King, Jr. Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey, 07102:

1.	Debtors' Motion For Entry Of An Order (A) Directing Joint Administration Of Chapter 11 Cases And (B) Granting Related Relief
2.	Application for Designation as Complex Chapter 11 Cases
3.	Debtors' Motion For Entry of An Order (I) Granting The Debtors An Extension Of Time To File Their List Of Creditors; (II) Authorizing The Debtors And/Or Their Agent To (A) Prepare A Consolidated List Of Creditors In Lieu Of A Mailing List And (B) Mail Initial Notices; And (III) Granting Related Relief
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6.	Debtors' Motion For Entry Of Interim And Final Orders Authorizing, But Not Directing, The Debtors To (A) Pay Certain Prepetition Wages, Salaries, Reimbursable Employee Expenses And Other Employee Compensation Expenses, And Taxes Related Thereto, (B) Honor Certain Employee Benefits, (C) Directing The Debtors' Banks To Honor Checks And Transfers Of Prepetition Employee Obligations, And (D) Granting Related Relief
7.	Debtors' Motion For Entry Of An Order Authorizing The Debtors To (I) Pay Pre-Petition Insurance Premiums (II) Continue Pre-Petition Insurance Programs And (III) Pay All Pre-Petition Obligations In Respect Thereof
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Debtor: National Realty Investment Advisors, LLC, *et al.*
Case No.: 22-14539
Caption: Order Regarding Debtors' Application For Expedited Consideration of First Day Matters

IT IS FURTHER ORDERED, that service of this Order must be made under D.N.J. LBR 9013-5(f) on the following parties by email and overnight mail: (i) the Office of the United States Trustee for the District of New Jersey, One Newark Center, Suite 2100, Newark, NJ 07102; (ii) the Debtors' thirty largest unsecured creditors and twenty largest investors, each on a consolidated basis; (iii) S3 RE Bergenline Funding, LLC, S3 RE 1300 Manhattan Funding LLC, and LendingOne LLC; (iv) the U.S. Attorney General; (v) the Internal Revenue Service; (vi) the Securities and Exchange Commission; (vii) the New Jersey Attorney General; (viii) the U.S. Attorney for the District of New Jersey; (ix) the New Jersey Division of Taxation; (x) the New Jersey Bureau of Securities; (xi) the New York Attorney General; (xii) the New York Department of Taxation and Finance; (xiii) the Florida Attorney General; (xiv) the Florida Department of Revenue; (xv) the Illinois Attorney General; (xvi) the Illinois Department of Revenue; (xvii) the Illinois Securities Department; (xviii) the Alabama Attorney General; (xix) the Alabama Department of Revenue; (xx) the Alabama Securities Commission; (xxi) the Debtors' banking institutions; (xxii) the Debtors' insurance providers; and (xxiii) those parties who have filed a notice of appearance and request for service of pleadings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002.

IT IF FURTHER ORDERED, that objections and/or responses to the Motions, if any, may be made under D.N.J. LBR 9013-5(d).